

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
MIDLAND DIVISION**

**In re:**

**Remnant Oil Company, LLC and  
Remnant Oil Operating, LLC,**

**Debtors.**

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**Case No. 19-70106**

**Case No. 19-70107**

**Chapter 11**

**(Jointly Administered)**

**KODIAK GAS SERVICES, LLC’S OBJECTION TO MOTION OF RONALD INGALLS,  
CHAPTER 7 TRUSTEE TO SELL REAL PROPERTY FREE AND CLEAR  
OF LIENS, CLAIMS, INTERESTS AND ENCUMBRANCES  
(Relates to Doc. No. 409)**

TO THE HONORABLE TONY M. DAVIS, U.S. BANKRUPTCY JUDGE:

Kodiak Gas Services, LLC (“Kodiak”), hereby submits this limited objection (“Objection”) to Motion Of Ronald Ingalls, Chapter 7 Trustee To Sell Real Property Free And Clear Of Liens, Claims, Interests And Encumbrances [Docket No. 409] (the “Motion”) and in support hereof, respectfully states as follows:

**I. LIMITED OBJECTION**

1. The Motion does not address Kodiak’s Gas Compression Unit, still set on location on the Caprock Asset. Although counsel for the Trustee has represented that the sale does not include the Gas Compression Unit (the “Unit”), the Motion is devoid of facts speaking to how the Unit is or is not included.

2. Kodiak objects to the extent that Ronald Ingalls, Chapter 7 Trustee (“Trustee”) seeks authorization to sell any asset not wholly owned by the Debtors’ estates, specifically including but not limited to Kodiak’s gas compression unit still set on location on the Caprock Asset. The Unit is owned and operated by Kodiak and neither the Debtors’ estate nor any other party in interest has an

ownership interest, right, or title in or to the Unit. To the extent Trustee's Motion seeks relief contrary to the above, Kodiak objects.

3. Kodiak further objects to the extent that Trustee is seeking to sell the estates assets to an insider of the Debtors, without a fulsome marketing and transparent sales process, and without the requisite specificity to identify what assets are being sold and/or what value is being placed on what respective assets.

4. Purportedly, the assets are described in exhibits to the Asset Purchase Agreement ("APA"), however, the version of the APA attached to the Motion does not include those exhibits, and the movant has not included those exhibits in their witness and exhibit list, or a final, executed copy of the APA for that matter. Until all parties in interest are provided this necessary factual detail, and given an opportunity to review and object, the Motion should be denied.

## **II. RESERVATION OF RIGHTS**

5. Kodiak reserves the right to object further upon discovery of additional material terms, consideration and/or information that is not fully and consistently set forth in the Motion.

## **III. PRAYER**

WHEREFORE Kodiak requests that the Court: (i) sustain this limited Objection; (ii) limit the relief sought by the Trustee in the Motion to the extent provided for herein; and (iii) grant such other and further relief as the Court deems just and proper.

Respectfully submitted on the 22<sup>nd</sup> day of June 2020.

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**COUNSEL FOR KODIAK GAS SERVICES, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the forgoing pleading was served upon filing via the Court's CM/ECF system upon those parties subscribing thereto, and by first class mail, postage prepaid and properly addressed, on June 22, 2020, to all parties listed on the attached Service List.

/s/ John Thomas Oldham  
John Thomas Oldham

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